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EX PARTE OR LATE FILED

November 12,2002

WRITTEN EX PARTE

RECEIVED

NOV 12 2002

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ms Marlene H. Dortch
Secretary
Federal Communications Commission
The Portals
445 12th Street, S.W.
Washington, D.C. 20554

Re: WC Docket No. 02-307 **Ex** Parte # 1

Dear Ms Dortch:

BellSouth Ex Parte #1 filed on November 7, 2002, included as an attachment an analysis of BellSouth's performance in both Florida and Tennessee under the Reject Interval Metric for the month of July. BellSouth has discovered a few minor errors in the quantification analysis for Florida reflected in that attachment, First, in the Reject Interval – Residence block, the misses attributable to Time Lags in Processing (Issue 8 in the attachment) had not been included. When those misses are included in the analysis, the volume of misses will correctly tally to 330, as indicated in the attachment. BellSouth also discovered that volumes of misses attributable to Miscellaneous error codes (Manually processed LSR) and Miscellaneous error codes after a FOC were incorrectly reported. Finally in the Reject Interval – Other Design block, the misses attributable to Miscellaneous error codes after a FOC (Issue 6 in the attachment) had not been included. When those misses are included in the analysis, the volume of misses for this category will correctly tally to 72. I have attached a spreadsheet with the corrected data highlighted in red for the record.

In Al Varner's Reply Affidavit at Paragraph 164 and at Paragraph 134 of Exhibit **PM-2** to Varner's Direct Affidavit, BellSouth Mr. Varner explained that a significant percentage of customer troubles associated with UNE ISDN loops was attributable to defective cable pairs or simply required reseating of circuit cards. Commission staff subsequently requested clarification of what BellSouth meant by "reseating." In response to that request, in a telephone conversation with Michelle Newcomb of the Wireline Competition Bureau, Denise Coca of the

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Wireless Telecommunications Bureau and Laurel Bergold of the General Counsel's Office on November 12, 2002, I explained that BellSouth used the term "reseating" to describe the situation when a technician removed a plug-in card associated with an ISDN line and then reinserted that card into the same slot in the BellSouth equipment that it had previously occupied. Reseating clears a trouble created by customer premises equipment that seizes a line for transmission of data and does not release the line when the transmission is completed. This failure to release the line prevents the line from being available when the customer attempts subsequently to send more data. I explained that such problems could be attributable to a defective modem or computer on the customer's premises.

In accordance with Section 1.1206, I am filing this notice and the attached responses electronically and request that you please place them in the record of the proceeding identified above. Thank you.

Sincerely,

Kathleen B. Levitz

Attachment

cc: Michelle Carey
Greg Cooke
Christine Newcomb
Janice Myles
Luin Fitch
James Davis-Smith
Sara Kyle
Beth Keating

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July 2002 0-8 Reject Interval (97% in ▮Hour)	Description Reference (Tab 3)	Total Misses	FL Volume	Swing	Measure if Fixed
Already Working Error	2	5.45%	18	0.19%	96.77%
MANUALP	5	2.73%	9	0.09%	96.67%
Total Misses			330		
Total Volume			9,649	3.42%	100.00%
Measure			96.58%		Pass

July 2002 0-8 Reject Interval (97% in 1 Hour)	Description Cross Reference (Tab 3)	percent of Total Misses	FL Volume	Swing	Measure if Fixed
USOC Incompatibility	3	50.00%	10	1.63%	98.37%
Miscellaneous error codes after a FOC	6	25.00%	5	0.82%	97.56%
Miscellaneous error codes (Manually processed LSR	7	20.00%	4	0.65%	97.39%
EDI Front-end Timestamp	1	5.00%	1	0.17%	96.91%
Total Misses			20		
Total Volume			614	3.26%	100.00%
Measure			96.74%		Pass

Note: Above analysis is based on a 100% sample of misses (20 PONs)

July 2002 O-8 Reject Interval (97% in 1 Hour)	Description Cross Reference (Tab 3)	Percent of Total Misses	FL Volume	Swing	Measure if Fixed
Loop + Port Combinations					
EDI Front-end Timestamp	1	30.02%	190	2.05%	95.18%
USOC Incompatibility	3	27.49%	174	1.88%	95.01%
Miscellaneous error codes (Manually processed LSR	7	9.95%	63	0.67%	93.80%
Lag in processing - following "AUTO CLARIFICATION" PLACED BY LESOG and before Clarify Requested for VER-9 (Defect 22374	9	7.42%	47	0.50%	93.63%
Miscellaneous error codes after a FOC	6	7.42%	47	0.50%	93.63%
Time Lags in Processing	8	5.06%	32	0.34%	93.47%
MANUALP	5	5.06%	32	0.34%	93.47%
COG/DDC down for maintenance period	11	5.06%	32	0.34%	93.47%
Multiple Resends to front-end	10	2.53%	16	0.16%	93.29%
Total Misses			633		
Total Volume			9,200	6.87%	100.00%
Measure			93.13%		Pass

July 2002 O-8 Reject Interval (97% in ▮Hour)	Description Cross Reference (Tab 3)	Percent of Total Misses	FL volume	Swing	Measure if Fixed
Miscellaneous error codes (Manually processed LSR	7	60 00%	3	12 50%	91 67%
Miscellaneous errnr codes after a FOC	6	40 00%	2	8 33%	87 50%
Total Misses			5		
Total Volume			24	20 83%	100 00%
Measure			79 17%		Pass

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July 2002 O-8 Reject Interval (97% in 1 Hour)	Description Cross Reference (Tab 3)	Percent of Total Misses	FL Volume	Swing	Measure if Fixed
Line Sharing					
Miscellaneous error codes after a FOC	6	63.64%	7	13.20%	92.45%
MANUALP	5	18.18%	2	3.77%	83.02%
Miscellaneous error codes (Manually processed LSR	7	18.18%	2	3.77%	83.02%
Total Misses			11		
Total Volume			53	20.75%	100.00%
Measure			79.25%		Pass

Note: Above analysis is based on a 100% sample of misses (11 PONs)

July 2002 O-8 Reject Interval (97% in 1 Hour)	Description Cross Reference (Tab 3)	Percent of Total Misses	FL Volume	Swing	Measure if Fixed
2W Analog Loop Design					
Miscellaneous error codes (Manually processed LSR	7	64.29%	27	17.65%	90.20%
Miscellaneous error codes after a FOC	6	23.81%	10	6.53%	79.08%
MANUALP	5	4.76%	2	1.31%	73.86%
Time Lags in Processing	8	2.38%	1	0.65%	73.20%
Multiple Resends to front-end	10	2.38%	1	0.65%	73.20%
Multiple "System Requeued" Messages	12	2.38%	1	0.65%	73.20%
Total Misses			42		
Total Volume			153	27.45%	100.00%
Measure			72.55%		Pass

Note: Above analysis is based on a 100% sample of misses (42 PONs)

July 2002 O-8 Reject Interval (97% in 1 Hour)	Description Cross Reference (Tab 3)	Percent of Total Misses	FL Volume	Swing	Measure if Fixed
2W Analog Loop Non-Design					
MANUALP	5	57.75%	41	27.70%	79.73%
Miscellaneous error codes after a FOC	6	25.35%	18	12.16%	64.19%
Miscellaneous error codes (Manually processed LSR	7	14.08%	10	6.75%	58.78%
Time Lags in Processing	8	2.82%	2	1.35%	53.38%
Total Misses			71		
Total Volume			148	47.97%	100.00%
Measure			52.03%		Pass

Note: Above analysis is based on a 51% sample of misses (36 PONs)

July 2002 O-8 Reject Interval (97% in 1 Hour)	Description Cross Reference (Tab 3)	Percent of Total Misses	FL Volume	Swing	Measure if Fixed
Other Design					
MANUALP	5	37.50%	12	16.66%	72.22%
Miscellaneous error codes (Manually processed LSR	7	31.25%	10	13.88%	69.44%
EDI Front-end Timestamp	1	9.38%	3	4.16%	59.72%
Multiple Resends to front-end	10	3.13%	1	1.38%	56.94%
Total Misses			32		
Total Volume			72	44.44%	100.00%
Measure			55.56%		Pass

Note: Above analysis is based on a 100% sample of misses (32 PONs)

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July 2002 O-8 Reject Interval (97% in 1 Hour)	Description Cross Reference (Tab 3)	Percent of Total Misses	FL Volume	Swing	Measure if Fixed
Other Non-Design					
Listing Already Exists Error	4	52.09%	1,247	17.39%	84.00%
Miscellaneous error codes (Manually processed LSR	7	22.93%	549	7.66%	74.27%
EDI Front-end Timestamp	1	8.31%	199	2.78%	69.39%
Lag in processing - following "AUTO CLARIFICATION" PLACED BY LESOG and before Clarify Requested for VER-9 (Defect 22374	9	8.31%	199	2.78%	69.39%
Multiple "System Requeued" Messages	12	6.27%	150	2.09%	68.70%
COG/DDC Down for Maintenance Period	11	2.09%	50	0.70%	67.31%
Total Misses			2394		
Total Volume			7,170	33.39%	100.00%
Measure			66.61%		Pass

Note: Above analysis is based on a 2% sample of misses (48 PONs)